

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LENA ARMAS and ANDREA BLUM,
individually and on behalf of all others similarly
situated,

Plaintiff.

V.

REALPAGE, INC., GREYSTAR REAL ESTATE
PARTNERS, LLC, CH REAL ESTATE
SERVICES, LLC, LINCOLN PROPERTY CO.,
FPI MANAGEMENT, INC., MID-AMERICA
APARTMENT COMMUNITIES, INC.,
AVENUE5 RESIDENTIAL, LLC, EQUITY
RESIDENTIAL, ESSEX MANAGEMENT
CORPORATION, AVALONBAY
COMMUNITIES, INC., COMMUNITIES
MANAGEMENT, LLC, SECURITY
PROPERTIES INC., B/T WASHINGTON, LLC
d/b/a BLANTON TURNER, INDEPENDENCE
REALTY TRUST, INC., CUSHMAN &
WAKEFIELD, INC., BH MANAGEMENT
SERVICES, LLC, and UDR, INC., CAMDEN
PROPERTY TRUST, ESSEX PROPERTY
TRUST, INC., THRIVE 22

Defendants.

Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs Lena Armas and Andrea Blum (collectively, “Plaintiffs”) and Defendant CH Real Estate Services LLC (“Carter-Haston”), by and through their respective counsel, hereby stipulate as follows:

**STIPULATION AND ORDER SUSPENDING DEADLINE FOR
DEFENDANT CH REAL ESTATE SERVICES LLC No. 2:22-
cv-01726**

VENABLE LLP
600 MASSACHUSETTS AVENUE, NW
WASHINGTON, DISTRICT OF COLUMBIA 20001
(202) 344-4000

1 WHEREAS, Plaintiffs filed a Class Action Complaint (the “Complaint”) on December 6,
 2 2022. ECF No. 1.

3 WHEREAS, Plaintiffs and certain other Defendants (“Stipulating Defendants”) entered
 4 into stipulations that, for purposes of judicial efficiency, suspend the date for Stipulating
 5 Defendants to answer, move to dismiss, or otherwise respond to the Complaint. ECF Nos. 51, 55,
 6 68, 72.

7 WHEREAS, the Court subsequently entered Orders that, *inter alia*, suspended the date for
 8 Stipulating Defendants to respond to the Complaint and required the parties to submit a status
 9 report by January 18, 2023. ECF Nos. 54, 56, 69, 73.

10 WHEREAS, on January 18, 2023, Plaintiffs and Stipulating Defendants submitted a joint
 11 status report in which Plaintiffs requested that the Court suspend the deadline for Stipulating
 12 Defendants to respond to the Complaint until after the Court resolves Plaintiffs’ pending Motion
 13 to Consolidate (ECF No. 70) and Stipulating Defendants requested that the Court continue to
 14 suspend the deadline until after the U.S. Joint Panel on Multidistrict Litigation rules on a pending
 15 motion to centralize related actions. ECF No. 75. Those requests are pending.

16 WHEREAS, Plaintiffs and Carter-Haston believe that judicial efficiency would be served
 17 by suspending the deadline for Carter-Haston to answer, move to dismiss, or otherwise respond to
 18 the Complaint, so that Carter-Haston’s deadline is the same as Stipulating Defendants.

19 THEREFORE, the parties stipulate and agree to suspend the deadline for Carter-Haston to
 20 answer, move to dismiss, or otherwise respond to the Complaint and request that the Court grant
 21 the request so that the deadline for Carter-Haston’s response to the Complaint is the same deadline
 22 as the Court sets for the Stipulating Defendants.

23 In making this stipulation, Carter-Haston does not waive, in this or any other action, any (i)
 24 defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative
 25

1 defenses under Fed. R. Civ. P. 8; (iii) other statutory or common law defenses that may be
2 available; or (iv) right to seek or oppose any reassignment, transfer, or consolidated alternatives.
3 Carter-Haston expressly reserves its rights to raise any such defenses (or any other defense) in
4 response to either the Complaint or any original, amended, or consolidated complaint that may be
5 filed in this or any other action.
6

7
8 STIPULATED to this 8th day of February, 2023.
9

10 s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)
steve@hbsslaw.com
Breanna Van Engelen (WSBA No. 49213)
breannav@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292

11
12
13
14
15 *Counsel for Plaintiffs Lena Armas and
16 Andrea Blum Individually and on Behalf of
17 All Others Similarly Situated*

18 s/ J. Douglas Baldridge

19 J. Douglas Baldridge (WSBA No. 37247)
JBaldridge@Venable.com
VENABLE LLP
600 Massachusetts Avenue NW
Washington, D.C. 20001
Telephone: (202) 344-4703

20
21
22
23
24
25
26
27
28 Danielle R. Foley (*pro hac vice*
forthcoming)

DRFoley@Venable.com
VENABLE LLP
600 Massachusetts Avenue NW
Washington, D.C. 20001
Telephone: (202) 344-4343

*Attorneys for Defendant
CH Real Estate Services LLC*

ORDER

THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for Defendant to Respond to the Complaint. Now, therefore, IT IS HEREBY ORDERED THAT:

The deadline for Defendant CH Real Estate Services LLC to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

DATED this 9th day of February, 2023.

Mr S Casnik

Robert S. Lasnik
United States District Judge

Presented by:

s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

steve@hbsslaw.com

Breanna Van Engelen (WSBA No. 49213)

breannav@hbsslaw.com

HAGENS BERMAN SOBOI SHAPIRO LLP

HAGENS BERMAN SOBEL SHAPIRO
1301 Second Avenue, Suite 2000

1501 Second Avenue
Seattle WA 98101

Seattle, WA 98101
Telephone: (206) 623-7292

*Counsel for Plaintiffs Lena Armas and
Andrea Blum Individually and
on Behalf of All Others Similarly Situated*

s/ J. Douglas Baldridge

J. Douglas Baldridge (WSBA No. 37247)

JBaldridge@Venable.com

VENABLE LLP

600 Massachusetts Avenue NW

Washington, D.C. 20001

Telephone: (202) 344-4703

**STIPULATION AND ORDER SUSPENDING DEADLINE FOR
DEFENDANT CH REAL ESTATE SERVICES LLC No. 2:22-
cv-01726**

VENABLE LLP
600 MASSACHUSETTS AVENUE, NW
WASHINGTON, DISTRICT OF COLUMBIA 20001
(202) 344-4000

1 Danielle R. Foley (*pro hac vice* forthcoming)

2 DRFoley@Venable.com

3 VENABLE LLP

4 600 Massachusetts Avenue NW

5 Washington, D.C. 20001

6 Telephone: (202) 344-4343

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Defendant
CH Real Estate Services LLC

STIPULATION AND ORDER SUSPENDING DEADLINE FOR
DEFENDANT CH REAL ESTATE SERVICES LLC No. 2:22-
cv-01726

VENABLE LLP
600 MASSACHUSETTS AVENUE, NW
WASHINGTON, DISTRICT OF COLUMBIA 20001
(202) 344-4000